PROBLEM IN JUSTICE

MAR 3 4 35 PH'81

UNITED STATES DEPARTMENT OF JUSTICE WASHINGTON, D.C. 20530

REGISTRATION UNIT CRIMINIAL DIVISION

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents Registration Act of 1938, as Amended

For Six Mont	h Period Ending 29	JAN 1081 (Insert date)	
Name of Registrant	- T 13 T.L.A	Registration No. 1421	
Development Counsellors	s Int.I rra.	1421	
Business Address of Registrant 733 Third Avenue-Suite NYC, N.Y. 10017	2100		
	I - REGISTRANT	·	
1. Has there been a change in the info	ormation previously furnis	shed in connection wit	h the following:
(a) If an individual:			
(1) Residence address(2) Citizenship	Yes [] Yes []	No XX No XX	
(3) Occupation	Yes	No 🛣	
(b) If an organization:			
(1) Name	Yes []	No XX	
(2) Ownership or control	Yes [] Yes []	No XX No XX	
(3) Branch offices	103 []	*** ***	
2. Explain fully all changes, if any, Not Applicable IF THE REGISTRANT IS		RESPONSE TO ITEM	S 3, 4, and 5,
IF THE REGISTRANT IS	S AN INDIVIDUAL, OMIT	RESPONSE TO TELL	5 3, 4, 4.14 21
3. Have any persons ceased acting a this 6 month reporting period?	Yes No XX	ctors or similar officia	ls of the registrant during
If yes, furnish the following inform	mation:		
<i>Name</i> Not Applicable	Position		Date Connection Ended

Have any persons period? Ye				
If yes, furnish the	following information:			
Name	Residence Address	Citizenship	Position	Date Assumed
Not Applica	able			
principal? Your If yes, identify ear	amed in Item 4 rendered services No XX ch such person and describe h		of the interests o	f any foreign
Not Applica	able			
terminated their e	ees or individuals other than omployment or connection with o	fficials, who have filed a sl the registrant during this 6 m	hort form registrat month reporting pe	ion statement riod?
If yes, furnish the	e following information:			
Name	Position or	connection	D	ate terminate
Not Applic	able			
Not Application of the registrant whe principal in other	nth reporting period, have any to rendered services to the reg r than a clerical or secretarial	istrant directly in furtheranc	e of the interests	er capacity b of any foreig
Not Application. During this 6 months registrant where the principal in othe Yes N	nth reporting period, have any or rendered services to the regorn than a clerical or secretarial oxx	istrant directly in furtheranc	e of the interests	er capacity by
Not Application. During this 6 months registrant where the principal in othe Yes N	nth reporting period, have any to rendered services to the reg r than a clerical or secretarial	istrant directly in furtheranc	e of the interests apacity?	or any lovery
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Not Application. During this 6 months registrant who principal in other Yes Notes Notes Name	nth reporting period, have any to rendered services to the regard than a clerical or secretarial oxix	istrant directly in furtherance, or in a related or similar ca Position or	e of the interests apacity?	ate connectio
Not Application. During this 6 months registrant who principal in othe Yes N If yes, furnish the Name	nth reporting period, have any to rendered services to the regard than a clerical or secretarial oxix	istrant directly in furtherance, or in a related or similar ca Position or	e of the interests apacity?	ate connectio

II - FOREIGN PRINCIPAL

8.	Has your connection with any foreign principal ended during this 6 month reporting X Yes X No	period?
	If yes, furnish the following information:	
	Name of foreign principal The Italian Economic Corporation U.S. Representative for Mezzogiorno Office	Date of Termination 12/31/80
9.	Have you acquired any new foreign principal during this 6 month reporting period?	Yes X No
	If yes, furnish following information:	
	Name and address of foreign principal	Date acquired
	The Italian Economic Corporation U.S. Representative for Mezzogiorno Office 25 West 51st Street NYC, N.Y. 10019	8/4/80
	represent during the 6 month reporting period. Glenrothes Development Corporation Netherlands Antilles Economic Mission Newfoundland Department of Industrial Development Trinidad & Tobago IDC UNIDO-United Nations Industrial Development Organi	zation
	III - ACTIVITIES	
11.	During this 6 month reporting period, have you engaged in any activities for or rend any foreign principal named in Items 8, 9, and 10 of this statement? Yes XX	dered any services to
	The Italian Economic CorpProvided assistance in U.S. sponsors a series of N.Y. based promotion place in N.Y.C., Washington & West Coast. Also assistance in developing a marketing plan in high quality investment inquiries. Glenrothes Development Corporation-Publicized & in businessmen about opportunities in Scotland wand malings. Netherlands Antilles-Publicized & informed U.S. businessmen about a ADS & press releases. Newfoundland-Publicized & informed U.S. businessmen in Newfoundland via releases. Trinidad & TobagoProvided consulting assistance with special reference to developing an opini & possibly the U.S. of executive additudes to Tobago in the perspective of the Carribean. UNIDO-Consulting services in connection with development of audio/visual slide presentation development of brochures & folders for various	coordinating with on meetings to take o provided consulting U.S. to attract formed U.S. ria press releases sinessmen about on about opportunities only to the client on poll in Canada oward Trinidad & oping draft report, ons, estimates &
	The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act	an individual or organi-

The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12.	During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?
	Yes No XX
	If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.
	Not Applicable
4	
13.	In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?
	Yes No XX
	If yes, describe fully.
	Not Applicable

The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14' (a) VECEILI2 - MONIE2	14.	(a)	RECEIPTS - MONIES
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	and 10	of this statem entributions, in	ent, or from a	porting period, have you received from any foreign principal named in Items 8, 9 nt, or from any other source, for or in the interests of any such foreign principal, ome or money either as compensation or otherwise?							
	If yes, such m	set forth below	v in the requir	in the required detail and separately for each foreign					n principal an account of		
	Date		From Whom			Purpose				Amount	
	(See	attached	listing	of	Receipts	of	monies	from	Foreign	Principals)	
								Tr	otal		
									otai	, , , , , , , , , , , , , , , , , , ,	
14. (b)		TS - THINGS (
	toreign p	his 6 month reporting ipal named sof any such for No XX	in Items 8, 9 preign princip	and	you received a 10 of this state	any the ment	ing of value , or from an	e ⁴ other t y other s	han money frource, for or	om any in the	
	If yes, fo	urnish the follo		ion;							
	Name	•		Dat	c	Des	cription of		_		
	foreign p	rincipal	1	receir	ved		g of value		P	urpose	
	Not	Applicab:	le								

A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(c).

Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

			-0-	
15. (a)]	DISBURSEMENTS - I	MONIES .		·
	(1) disbursed or expe	reporting period, have you ended monies in connect 10 of this statement?		of any foreign principal named
((2) transmitted moni	es to any such foreign p	rincipal? Yes 🗍 🔝	No XX
			and separately for each fore to each foreign principal.	eign principal an account of such
1	Date	To Whom	Purpose	Amount
	ee attached l preign Princi		Disbursements of	f monies for
		,		

Total

15.	(b)	DISBURSEMENTS -	THINGS	OF	VALUE
-----	-----	------------------------	---------------	----	-------

During this 6 month reporting period, have you dis	sposed of anything of value 5 other than money in
furtherance of or in connection with activities on	behalf of any foreign principal named in items 8, 5
and 10 of this statement?	

Yes No XX

If yes, furnish the following information:

Date disposed

Name of person to whom given

On behalf of what foreign principal

Description of thing of value

Purpose

Not Applicable

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes No [XX]

If yes, furnish the following information:

Date

Amount or thing of value

Name of political organization

Name of candidate

Not Applicable

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes XX No

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Glenrothes Netherlands Antilles Newfoundland

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

fied sum of money to finance your activities in preparing or disseminating political propaganda? Yes No XX	ci-
If yes, identify each such foreign principal, specify amount, and indicate for what period of time.	
Not Applicable	
Not rippitedate	
19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the disciplination of policical processed in the disciplination of the discipli	
ination of political propaganda include the use of any of the following: Radio or TV broadcasts X Magazine or newspaper Motion picture films Letters or telegral	
articles	ns
X Advertising campaigns X Press releases Pamphlets or other Lectures or	
Dther (specify)	
20. During this 6 month reporting period, did you disseminate or saves as by disseminate	
The same to the same groups.	1 —
Public Officials Newspapers Libraries	•
Legislators X Editors Educational institutions	ì
Government agencies Civic groups or associations Nationality groups	
Other (Specify) Area Development Publications	
21. What language was used in this political propaganda:	
X English Other (specify)	
22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propagation against a discominated as a second of the second o	_ -
against material disseminated or caused to be disseminated during this 6 month reporting period?	,-
Yes X No	
23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes X No	f
24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item o	f
such political propaganda material as required by Rule 401 under the Act?	
Yes X No No	
VI - EXHIBITS AND ATTACHMENTS	=
25. EXHIBITS A AND B	
(a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:	
Exhibit A ⁶ Yes X No	
Exhibit B ⁷ Yes X No	
If no, please attach the required exhibit.	
(a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?	n
Yes No X	
If yes, have you filed an amendment to those out this.	
If no, please attach the required amendment.	

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

7 The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C	
If you have previously filed an Exhibit C ⁸ , state when 6 month reporting period. Yes \(\sumeq\) No \(\frac{\chi \chi}{\chi \chi}\)	ther any changes therein have occurred during this
If yes, have you filed an amendment to the Exhibit C? Not Applicable	Yes No
If no, please attach the required amendment.	
Not Applicable	
27. SHORT FORM REGISTRATION STATEMENT	
Have short form registration statements, been filed by supplemental statement? Yes No	all of the persons named in Items 5 and 7 of the
If no, list names of persons who have not filed the requ	uired statement.
Not Applicable	
in attached Short Form Registration Statement, if any, insorbis (their) personal knowledge. (Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)	(Type or print name under each signature) Ted M. Levine/President
Subscribed and sworn to before me at New York	Emanuel T. Ellenis/Vice Presiden
observed and sworn to before me at 1 wo 100 ii	Joen 101
his 2nd day of March	, 19 8/
	begoing K. Lunson
	Notary Public, State of New York No. 31-4668717
8 The Exhibit C, for which no printed form is provided, consist	Qualified in New York County s of a true County sais and sais a March 30, 196;

The Exhibit C, for which no printed form is provided, consists of a true Copy so the Errater, affices of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

Development Counsellors Int'l Ltd. 733 Third Avenue Suite 2100 Client: Mr Italia 10017 212-687-1383 NYC, N,Y. U.S. Dept. of Justice Report 7/30/80 to 1/09/8/3 Total DCI Exchange Date Details: Fee Expenses Receipts 8/7 140,0000 10/20 1400000 11_185 140000 1 26 12/15 1400000 140000 86839 86839 Research Project. 18 Chase Durch ma Ploza 24 TML - america + Express - Ey action Photo- States 30 Clarofora. Chused Que nations Gold Star Wine , Sport . 6 O Coken - Experação S. Cohen - Exgression 10 & T. Ellenes - Expen Carol Radyra Expenses Coursell 6 ETELLE - Experies 10 Carol Budegno - Eygen so Conserel 24000 25 Patricia Theory · Eyes 15 D. Cohen Eypen 2400 27 Im Levene - Eype. 176 40 28 15 15 7. Kneight Expe. O. Cohon - Eypen vers 4/6,5#30 481 31 E. T. Elle new Expression 31 O. Coken - Eyfren 2300°2 31 Semax Statures Suggesting 11 4 TML - Calback Marker ad Exper C73334 Carol Bulleyea Expension 38/23 35 36874 36 Phone: 14 Q. Cohen-Eyre xxxx 7.737 H m. Brown Expinse 95/2016 18 Action Compacte Corp- nougran 13000 17 2434 18 18 Chase Duect Mail - Swelators TML- ancien Express Expenses 18 Marker Phother Com

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Client: General Constation 733 Third Avenue Guite 2100

NYC, N.Y, 10017 212-687-1383

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Do Antoles Economic 733 Third Avenue Lite 2100 Missim NYC, N.Y. 10017 212-687-1383 U.S. Dept. of Justice Report 1/30/80 to 1/29/81 Total DCI Foreign Total Cash Exchange Receipts Disbursements Details: Fee Date Expenses 75000 6/30 7 24 8/22 99 106 1/31 8/30 9/30 11/21 69000 1218 18 10/30 11/31 18 12 30 12/30 25000 151500 157864 11 715 E.T. Ellers - EVA 12 3010 75 ET Ellens Exp 13 25 Phone 8.13 TGA Grapher - Sy 2000 345 16 3965 9 12 8. T. Elleres -19 21 22 1/95 23 18 12 nessenger 23 Messenger 30 80 21 8 T Ellens - Ex 27 28 28 29 29 30 30 31 32 34 35 36 37 38 TOTAL DISBURSEMENTS --36151

Development Coursellers July Wed. 733 Third Avenue Suite 2100

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2680,61

NYC. N.Y. 10017 212-687-1383 U.S. Dept. of Justice Report 7/30/80 to 1/39/81 3 Total DCI Less Foreign Cash Total Exchange Disbursements Receipts Expenses Fee Details: 2083330 June to august 4166 ble 12 5 30 142 1 20 TOTAL RECEIPTS ----10 11 72 neverger Radio Tileports 8639 15 Media Distribution 24 Rose To Reports 16 8 13 Radio TV Reports 18 6600 19 13 Cours Selegran - Expe 19 20 26 Phone 21 9 25 media Distribu 25 News Sports Radio X 23 128/ 24 10 15 Jack Dotson - Write 29 ET Ellers - Exper 26 11 5 Corol Badyan -12 27 Ellow - Exp. 14 ET Elleris - adi 27 28 29 30 18 nessenger 25 Wester Unem- Markgra 31 ETELLENIO-Expe 17 PR Newwie 34000 35 189737 19 31 O. Cohen - Eypen 9 40.38 messenger 14286 39 21 ET Ellers Expense

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733 Third Avenue Duite 2100 Dwdopment Organization NYC. N.Y. 10017 212-687-1383 U.S. Dept. of Justice Report 7/30/80 to 1/29/81 3 Total DCI Foreign Total Cash Exchange Details: Receipts Disbursements Date Fee **Expenses** TOTAL RECEIPTS TOTAL DISBURSEMENTS

UNITED STATES DEPARTMENT OF JUSTICE REGISTRATION UNIT CRIMINAL DIVISION WASHINGTON, D. C. 20530

MAR 3 4 35 FM'81.

BECISTRATION UNIT CRIMINAL DIVISION

NOTICE

Pl	leas	е	answer	the	f.o.	llowir	ıg	questions	and	return	thi	S
sheet	in	tr	iplicat	e w	ith	your	รเ	upplemental	sta	atement:	,	

sheet in triplicate with your supplemental statement:
1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form DJ-302 - Supplemental Statement):
Yes XXX or No
(If your answer to question 1 is "Yes" do not answer question 2 of this form.)
2. Do you disseminate any material in connection with your registration:
Yes or No
(If your answer to Question 2 is "Yes" please forward for our review copies of all such material includding; films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)
March 2, 1981 Signature Date
Ted M. Levine

Ted M. Levine
Pléase type or print name of
signatory on the line above

President Title